



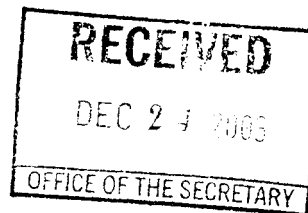
**HGK Asset Management, Inc.**

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December 18, 2003

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Johnathan G. Katz  
Secretary  
Securities & Exchange Commission  
450 Fifth Street, NW  
Washington, DC 20549



**RE: File No. S7-19-03**

Dear Mr. Katz:

I am writing in support of the Securities and Exchange Commission proposal S7-19-03 regarding security holder director nominations. HGK Asset Management, Inc. is an investment advisor under the 1940 Act that recognizes the importance of effective, balanced corporate governance. It is time for the Securities & Exchange Commission to make dramatic changes so that corporate boards are represented by independent, responsible, qualified individuals and not just the "connected few" of each company's CEO.

It is my position as Chief Operating Officer of HGK Asset Management, Inc., currently managing \$2 billion in tax exempt benefit assets, that while S7-19-03 protects corporate and investor interests through numerous procedural safeguards, it fails to ensure corporate accountability because share ownership thresholds required for submission of shareholder proposals and nominations are set to high. As a top 500 firm, HGK and firms larger have little voice representing our clients' interests under the current language of S7-19-03.

Never before has our country found the complete lack of confidence in Corporate Boards and mutual funds than today. The Securities and Exchange Commission can go a long way to eliminate this feeling of mistrust, open the closed corporate boards to qualified, Independent Board Director candidates, and restore the trust in all Americans investing their hard earned money in qualified corporations and Mutual Funds.

On behalf of HGK Asset Management, Inc., I encourage the Commission to adopt the most efficient rules possible for proposal S7-19-03

Sincerely,  
*HGK Asset Management, Inc.*

Arthur E. Coia, II  
Chief Operating Officer  
(9903)